

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

**BOSTON GAS COMPANY d/b/a KEYSPAN ENERGY  
DELIVERY NEW ENGLAND**

**D.T.E. 03-40**

ATTORNEY GENERAL'S THIRTIETH SET OF  
DOCUMENT AND INFORMATION REQUESTS  
(corrected)

Information requests to Dr. Kaufmann:

- AG-30-1      Please provide a table showing Boston Gas total revenues, total therms sold and transported, and total gas costs, for the years 1990 – 2002.
- AG-30-2      Mr. Kaufman argues that for some companies “the most appropriate value for a consumer dividend is zero.” (KEDNE/LRK-1 p.6) Please explain what the benefits to customers of a PBR will be if the consumer dividend is zero.
- AG-30-3      Please compute labor productivity alone for the Northeast gas utilities, using the same data that was used in the TFP study.
- AG-30-4      What investigation did you do to determine if the cost impact of customer growth, such as whether the utility does or does not need to add mains in order to add customers, in the past is indicative of the cost impact of customer growth in the future?
- AG-30-5      What investigation did you do to determine if the cost impact of customer growth is the same between utilities?
- AG-30-6      Please produce results of the cost study with the addition of the percentage increase in distribution miles by year, as an explanatory variable. All other variables should remain the same as those in Table 2 of Exh. KEDNE/LRK-3, unless there are multicollinearity problems with the percentage of distribution mains, in which case this variable should be removed.
- AG-30-7      Referring to the response to AG 12-10, how was the Labor Cost share on the sheet Cost Model Inputs calculated?



- AG-30-8 Please provide a version of the response to AG 12-10 with all formulae intact, and any reference files included.
- AG-30-9 If not provided in response to above, show the derivation of all indexes in TFP Output table.
- AG-30-10 If not provided in response to the above, provide workpapers showing how the “capital cost” on the tfinput sheet is derived from the “capital output” data.
- AG-30-11 If not provided in response to the above question, provide an explanation of and workpapers showing how the asset price index was computed.
- AG-30-12 If not provided in response to the above question, explain how both the asset price index and the triangularized index were utilized to produce the capital quantity index.
- AG-30-13 If not provided in response to the above question, show the derivation of all indexes in the TFP Outputs worksheet.
- AG-30-14 Why is it appropriate to measure gas utility productivity change over the same period of time that total private business productivity is measured?
- AG-30-15 Please explain the relationship between the triangularized index computed in the response to AG-18-4 and the triangularized asset price index contained in AG 12-10.
- AG-30-16 Please explain why the triangularized asset price index contained in AG 12-10 capital input worksheet is the same for each year, for each utility, and the basis for the differences between utilities.
- AG-30-17 Did PEG perform any analysis to determine if the relative value of plant by accounts was the same between each utility?
- AG-30-18 In response to AG-12-18, you indicated that density, as measured by miles of distribution main per customer, was tested. Please provide the parameters of the equation which included this variable.
- AG-30-19 In the test of density, how was distribution main defined?
- AG-30-20 If not previously tested, please test a measure of density which includes mains which are classified as transmission.

DATED: June 16, 2003.